

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

JEREMY GAY as the Wrongful Death Personal
Representative of the ESTATE OF RODNEY LYNCH,
RHONDA LYNCH, Individually and on behalf
of L.N.L., a Minor Child, SHENALE LEANN TSO,
Individually, MELANIE LYNN LYNCH, Individually,
and AMBER REE LYNCH, Individually,

Plaintiffs,

vs.

No. 1:21-cv-00604-JCH-KK

JUSTIN OLVERA, in his individual capacity,
ELIJAH BOWMAN, in his individual capacity,
CITY OF GALLUP, a Municipal Corporation
of the State of New Mexico, and GALLUP
POLICE CHIEF FRANKLIN BOYD,

Defendants.

AFFIDAVIT OF JOHN ALLEN

STATE OF NEW MEXICO)
) ss.
COUNTY OF MCKINLEY)

I, John Allen, upon oath depose and state:

1. I was employed with the City of Gallup Police Department for over (23) years.
2. At the time of the incident at issue in this lawsuit, I had been retired from the Gallup Police Department for (3) three years.
3. At the time of my retirement and based on information and my belief, as of the day of the incident involving Mr. Lynch:

Exhibit "C"

A. CSAs were required and authorized to detain people for arrest. At times, CSAs engaged in pursuits and traffic stops. CSAs used physical force to prevent subjects from leaving an area on a daily basis.

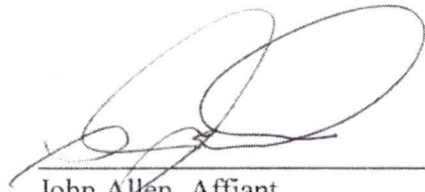
B. CSAs held individuals accused of a crime in custody. They often transported prisoners and arrestees.

C. CSAs are dispatched on a daily basis to subjects who were acting disorderly and at times responded to alarm calls.

D. CSAs were also used for traffic control and crowd control.

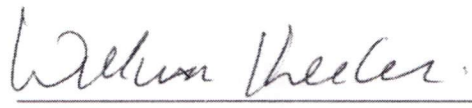
E. CSAs trained how to use handcuff in the same classes as police officers.

F. Prior to 2019, the Gallup Police Department changed the handcuff policy to allow CSAs to use hand cuffs on individuals.



John Allen, Affiant

Subscribed and sworn to before me this 19th day of November, 2021 by JOHN ALLEN.



Notary Public

My Commission Expires:

3-13-2022